



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**MAR 05 2014**

Mr. David Serpa, Plant Manager  
Guardian Industries Corp.  
11535 E Mountain View Ave  
Kingsburg, CA 93631-9233

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-598  
Project # C-1133452**

Dear Mr. Serpa:


Enclosed is the District's analysis of your application for a minor modification of the Title V permit for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-598-13-0 into the Title V operating permit. The ATC authorizes the installation of a 2,800 cubic feet (20,945 gallons) storage silo served by a bin vent filter to store waste dust from the electrostatic precipitator (EP). The proposed storage silo is to be used optionally in lieu of the existing EP dust removal operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-598-13-0, emission increases, and your permit application for a minor modification to the Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

## **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: C-1133452

Engineer: Brian Clerico  
Date: March 3, 2014

Facility Number: C-598  
Facility Name: Guardian Industries Corp.  
Mailing Address: 11535 E Mountain View Ave  
Kingsburg, CA 93631-9233

Contact Name: David Serpa  
Phone: (559) 896-6400

Responsible Official: David Serpa  
Title: Plant Manager

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### **I. PROPOSAL**

Guardian Industries Corporation is proposing a Title V minor permit modification to incorporate the recently issued C-598-13-0 into the Title V operating permit. The ATC authorizes the installation of a 2,800 cubic feet (20,945 gallons) storage silo served by a bin vent filter to store waste dust from the electrostatic precipitator (EP). The proposed storage silo is to be used optionally in lieu of the existing EP dust removal operation.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### **II. FACILITY LOCATION**

This project is located at 11535 East Mountain View Avenue in Kingsburg.

### **III. EQUIPMENT DESCRIPTION**

C-598-13-0: ELECTROSTATIC PRECIPITATOR DUST COLLECTION  
OPERATION CONSISTING OF ONE 20,945 GALLON (2,800  
CUBIC FEET) STORAGE SILO SERVED BY A BIN VENT FILTER

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

ATC C-598-13-0 is a new permit unit; therefore, there is no existing Title V PTO that it will be modifying. All the ATC conditions will be carried over to the proposed PTO C-598-13-1 with the following exceptions:

ATC condition #1 requires the facility to submit an application to modify the Title V permit prior to operating under the ATC. This is a one-time requirement that is fulfilled by this application; therefore, condition #1 may be removed.

Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4.

ATC condition #3, which prohibits the discharge of air contaminants that cause a public nuisance, is already present on the facility-wide PTO C-598-0-4 as condition #41. To avoid redundancy, ATC condition #3 will not be carried over to the proposed PTO C-598-13-1.

ATC condition #5, which prohibits the discharge of air contaminants as dark or darker than 20% opacity, is already present on the facility-wide PTO C-598-0-4 as condition #40. To avoid redundancy, ATC condition #5 then will not be carried over to the proposed PTO.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for

- temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
    - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
    - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
  5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
  6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. C-598-13-1
- B. Authority to Construct No. C-598-13-0
- C. Emissions Increases
- D. Application

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
C-598-13-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-598-13-1

**EXPIRATION DATE:** 01/31/2016

**EQUIPMENT DESCRIPTION:**

ELECTROSTATIC PRECIPITATOR DUST COLLECTION OPERATION CONSISTING OF ONE 20,945 GALLON (2,800 CUBIC FEET) STORAGE SILO SERVED BY A BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The bin vent filter serving the storage silo shall have a minimum control efficiency of 99%. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from the bin vent filter serving the electrostatic precipitator dust storage silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour [District Rule 2201] Federally Enforceable Through Title V Permit
5. Visible emissions shall be checked each day the silo is loaded. If visible emissions are observed using EPA Method 22, EPA Method 9 shall be used to determine compliance with the opacity limit of the bin vent filter. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
6. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The silo shall not be loaded if the filters in the bin vent are not functioning per manufacturers recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The maximum daily throughput of electrostatic precipitator dust transferred into the storage silo shall not exceed 5,616 lb-dust/day, in any one day [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions rate from the electrostatic precipitator dust storage operation shall not exceed 0.0047 lb-PM10/ton-dust. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of the daily amount of electrostatic precipitator dust transferred into the silo shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# ATTACHMENT B

Authority to Construct No.  
C-598-13-0



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

## AUTHORITY TO CONSTRUCT

PERMIT NO: C-598-13-0

ISSUANCE DATE: 12/10/2013

LEGAL OWNER OR OPERATOR: GUARDIAN INDUSTRIES CORP  
MAILING ADDRESS: 11535 E MOUNTAIN VIEW AVE  
KINGSBURG, CA 93631-9211

LOCATION: 11535 E MOUNTAIN VIEW AVE  
KINGSBURG, CA 93631

**EQUIPMENT DESCRIPTION:**

ELECTROSTATIC PRECIPITATOR DUST COLLECTION OPERATION CONSISTING OF ONE 20,945 GALLON (2,800 CUBIC FEET) STORAGE SILO SERVED BY A BIN VENT FILTER

## CONDITIONS

1. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. The bin vent filter serving the storage silo shall have a minimum control efficiency of 99%. [District Rule 2201]
7. Visible emissions from the bin vent filter serving the electrostatic precipitator dust storage silo shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour [District Rule 2201]
8. Visible emissions shall be checked each day the silo is loaded. If visible emissions are observed using EPA Method 22, EPA Method 9 shall be used to determine compliance with the opacity limit of the bin vent filter. [District Rules 2201 and 2520]
9. The bin vent filter shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services  
C-598-13-0 Date 10/2013 9:34AM - GARCIA Just Inspection NOT Required



10. The bin vent filter cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
11. The silo shall not be loaded if the filters in the bin vent are not functioning per manufacturers recommendations. [District Rule 2201]
12. The maximum daily throughput of electrostatic precipitator dust transferred into the storage silo shall not exceed 5,616 lb-dust/day, in any one day [District Rule 2201]
13. PM10 emissions rate from the electrostatic precipitator dust storage operation shall not exceed 0.0047 lb-PM10/ton-dust. [District Rule 2201]
14. Records of all maintenance of the bin vent filter, including all change outs of filter media, shall be maintained. [District Rule 2201]
15. Records of the daily amount of electrostatic precipitator dust transferred into the silo shall be maintained. [District Rule 2201]
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201]

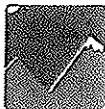
# ATTACHMENT C

Emissions Increases

ATC's in this project	SSIPE (lb/yr)				
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-598-13-0	0	0	37	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>37</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application




# San Joaquin Valley Air Pollution Control District

www.valleyair.org



## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT [ X ] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Guardian Industries Corp	
2. MAILING ADDRESS:  STREET P.O. BOX: <u>11535 E Mountain View Ave</u>  CITY: <u>Kingsburg</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93631-9233</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>11535 E Mountain View Ave</u> CITY: <u>Kingsburg</u>  ____ SECTION ____ TOWNSHIP ____ RANGE ____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Glass Manufacturing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  A temporary EP Dust Silo. On PTO C-598-13-0	
6. TYPE OR PRINT NAME OF APPLICANT:  David Serpa	TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: 	DATE: <u>12/10/13</u>  PHONE: ( 559 ) 896-6400 FAX: ( ) EMAIL: bsolomon@guardian.com

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>C-1133452</u> FACILITY ID: <u>C-598</u>

